

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Digital Audio Broadcasting Systems)	MM Docket No.
99-325		
And Their Impact On the Terrestrial Radio)	
Broadcast Service)	

To: The Commission

This is a response to the many comments I see posted encouraging its immediate implementation "Ibiquity digital corporation IBOC system." While as a public radio station general manager I would like to see something in digital radio soon, I am extremely reluctant to endorse any IBOC system that does not fix a larger problem facing the future of radio. Allow me to explain the steps I took to arrive at this decision.

1. In public radio, we try to provide alternative programs that will draw a substantial niche audience. Even with several stations under my direction, however, I cannot broadcast all the worthwhile programming that is available. I currently serve a classical music and in-depth, intelligent news/talk niche, but I cannot also serve the growing Spanish-speaking audience or the jazz-loving audience or Celtic music-loving audience at the same time. If we "upgrade" radio, I should be able to provide more than one program service through the same system.
2. My first major concern regarding IBOC is its inability to provide me the chance to offer more programming. I need more opportunities to gain an audience because...
3. In addition to running a station, I also teach college courses. A survey of my class indicated that a majority of my 19-year-old students do not listen to radio. They do not like the music presented to them, so they are looking elsewhere. Now they can find what they want by downloading the music they like, eliminating the need for radio altogether.
4. I experimented and have found that I can go online and listen to streamed programs I want to hear, or download the music and programs I would like to listen to later. I understand my students' ability to completely bypass radio.
5. It does not bode well for the future of our industry if we can't find a way to provide more than an unlimited series of "pipes" or "streams" within a radio signal.

6. Even more important, radio must evolve away from the “push” model of programming (in which radio provides one program to listeners when the radio stations expect listeners to listen) to the “pull” model of programming (in which listeners gather and listen to the programs they want to hear on their own timetable).

If we do not address these concerns, then I believe the decision to adopt IBOC will ultimately drive the radio industry into telecommunications obscurity.